

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

FILED

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In re:

City of Detroit, Michigan

Debtor

BANKRUPTCY COURT Bankruptcy Case No. 13-53846  
E.D. MICHIGAN-DETROIT Docket Number 10780  
Honorable Thomas J. Tucker

I. Ms. Linda Riley, hereby place the following objections on the record:

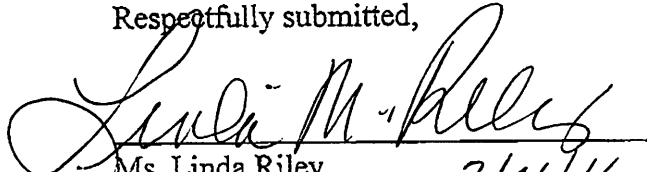
1. Pursuant to MICH. CONST. art. IX, § 24 "The accrued financial benefits of each pension plan and retirement system of the state and its political subdivisions shall be a contractual obligation thereof which shall not be diminished or impaired thereby." Therefore, no individual, no municipality, no state actor, the State of Michigan, or any other entity, government, local or state official, had the authority to act contrary to the Michigan Constitution. Any action taken by the actors that commenced this action is a nullity, because said action impairs the "accrued financial benefits of each pension plan and retirement system of the state and its political subdivisions". The actors who commenced this proceeding acted in violation of Michigan law. The afore-mentioned actors did not have the authority under Michigan law to even commence a action in this Court regarding the "accrued financial benefits of each pension plan and retirement system of the state and its political subdivisions." Therefore any ruling relating to Ms. Linda Riley is a nullity.
2. The Emergency Manager lacked the authority to commence this action in an official capacity. The law creating an emergency manager was never properly enacted by the Michigan Legislature; therefore, the Emergency Manager lacked the authority to take any action regarding the accrued financial benefits of each pension plan and retirement system

of the state and its political subdivisions.

WHEREFORE, Ms. Linda Riley, respectfully demands that any action, judgment, or finding taken against the accrued financial benefits of her pension plan – and/or retirement system benefits – be vacated, that she be restored to the position that she was in prior to the commencement of this proceeding, and that this Court grant any other relief that it deems just, equitable and proper.

DATE: 21 March 2016  
Detroit, Michigan

Respectfully submitted,

  
Ms. Linda Riley  
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3/21/16